

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK
SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

V.

MAGDALENA TAVELLA, ANDRES HORACIO
FICICCHIA, GONZALO GARCIA BLAYA,
LUCIA MARIANA HERNANDO, CECILIA DE
LORENZO, ADRIANA ROSA
BAGATTIN, DANIELA PATRICIA
GOLDMAN, MARIANO PABLO
FERRARI, MARIANO GRACIARENA,
and FERNANDO LOUREYRO,

Defendants.

Case No.: 13-cv-4609-NRB

**NOTICE OF MOTION FOR LEAVE TO WITHDRAW
AS COUNSEL OF RECORD FOR DEFENDANTS**

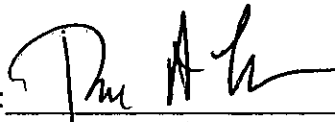
PLEASE TAKE NOTICE that, upon the Declaration of Steven W. Schuster, Esq., dated September 11, 2013 together with the exhibits thereto, and the Memorandum of Law in support of motion to withdraw, also dated September 11, 2013, both submitted to the Court *in camera*, McLaughlin & Stern, LLP, attorneys for Defendants, will move this Court, before the Honorable Naomi Reice Buchwald for (i) an Order pursuant to Local Civil Rule 1.4 and New York Professional Rules 1.16(c)(5) and (7), granting McLaughlin & Stern permission to

withdraw as attorneys for the Defendants herein and (ii) for any such further relief that the Court deems just and proper.

Dated: New York, NY
September 16, 2013

(corrected as to docket number)

McLAUGHLIN & STERN, LLP

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